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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA
 (HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,)	Case No. 08cr0724-WQH
)	
)	Date: May 19, 2008
)	Time: 2:00 p.m.
Plaintiff,)	
)	NOTICE OF MOTIONS AND <i>IN LIMINE</i>
v.)	MOTIONS TO:
)	
JOSE ELIAS CAMACHO-MELENDEZ,)	1) PRECLUDE EVIDENCE UNDER 404(B);
)	2) ORDER PRODUCTION OF GRAND JURY
)	TRANSCRIPTS;
Defendant.)	3) GRANT ATTORNEY CONDUCTED VOIR
)	DIRE;
)	4) EXCLUDE EVIDENCE OF "MUG SHOT"
)	PHOTOS;
)	5) EXCLUDE PROPOSED EXPERT
)	TESTIMONY WITHOUT NOTICE;
)	6) ORDER PRODUCTION OF TECS;
)	7) EXCLUDE TECS FROM TRIAL.
)	8) PRECLUDE TESTIMONY BY MATERIAL
)	WITNESS; and
)	9) EXCLUDE EVIDENCE OF MATERIAL
)	WITNESS CONDITION.

TO: KAREN HEWITT, UNITED STATES ATTORNEY, and
 LAWRENCE CASPER, ASSISTANT UNITED STATES ATTORNEY

Jose Camacho-Melendez, by and through his counsel, Kasha K. Pollreisz, and Federal Defenders
 of San Diego, Inc., brings these motions *in limine* and other trial motions to:

- 1) Preclude Evidence under 404(b);
- 2) Order Production of Grand Jury Transcripts;
- 3) Grant Attorney Conducted Voir Dire;
- 4) Exclude Evidence of "Mug Shot" Photos;
- 5) Exclude Proposed Expert Testimony Without Notice;
- 6) Order Production of Tecs;.
- 7) Exclude Tecs from Trial.

- 8) Preclude Testimony by Material Witness; and
- 9) Exclude Evidence of Material Witness Condition.

Mr. Camacho-Melendez brings these motions pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules. These motions are based on the previously submitted statement of facts and memorandum of points and authorities.

Respectfully submitted,

s/ Kasha K. Pollreisz

Dated: May 5, 2008

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